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VIA ECF

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March 28, 2025

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The Honorable P. Kevin Castel
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Ben & Jerry's Homemade, Inc. and Class I Directors of Ben & Jerry's v. Unilever PLC and Conopco, Inc.*, Case No. 24-cv-8641-PKC (S.D.N.Y.)

Dear Judge Castel:

Pursuant to Rule 1(C) of Your Honor's Individual Practices, the parties seek to clarify the briefing schedule regarding Plaintiffs' Motion for Leave to File Second Amended Complaint. Plaintiffs filed a Notice of Motion to Amend on March 18, 2025 (ECF No. 37, 38). Plaintiffs filed a memorandum of law in support of the motion on March 25, 2025 (ECF No. 45).

The parties have conferred and agreed that the briefing schedule should be triggered by the date of the memorandum of law filing. As a result, pursuant to Fed. R. Civ. P. 15(a)(3), we respectfully request that the Court enter an order directing that Defendants' response be due on April 8, 2025 and any reply by Plaintiffs be due on April 22, 2025.

The parties have also conferred and further request a one week extension for Plaintiffs to respond to Defendants' Motion to Dismiss (ECF No. 39-41) as well as a one week extension for Defendants' reply. As a result, we respectfully request that the Court enter an order directing that Plaintiffs' response is due on April 28, 2025 and any reply by Defendants be due May 23, 2025.

There have been no prior extensions regarding Plaintiffs' Motion to Amend or Defendants' Motion to Dismiss. There is currently no conference scheduled.

We thank the Court for its attention to this matter.

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Respectfully submitted,

/s/ David J. Lender

David J. Lender

*Attorney for Defendants Unilever PLC and
Conopco, Inc.*

cc: All Counsel of Record (Via E-filing)

/s/ Shahmeer Halepota

Shahmeer Halepota

*Attorney for Plaintiffs Ben & Jerry's
Homemade, Inc. and the Class I Directors of the
Ben & Jerry's Board*